

1  
2  
3  
4  
5  
6  
7 BEFORE THE STATE OF WASHINGTON  
8 ENERGY FACILITY SITE EVALUATION COUNCIL

9  
10 In the Matter of  
Application No. 2003-01

11 SAGEBRUSH POWER PARTNERS, L.L.C.

12  
13 KITTITAS VALLEY WIND  
14 POWER PROJECT  
15  
16

Application No. 2003-01

Renewable Northwest Project  
Petition to Intervene

17  
18 **I. INTRODUCTION**

19 The Renewable Northwest Project (“RNP”) files this petition to intervene pursuant to  
20 RCW 34.05.443, WAC 463-30-400, and the Notice of Opportunity to Intervene, dated May 16,  
21 2003. Intervention should be granted as RNP, a nonprofit with an interest in the promotion of  
22 the responsible development of clean, new renewable resources, has an interest in the  
23 proceeding which will be impaired if intervention is not granted.  
24  
25  
26

## II. ARGUMENT

### A. **Intervention Should be Granted as RNP's Interest in Responsible, New Renewable Energy Development in the Pacific Northwest will be Impaired without the Granting of Intervenor Status**

“Intervention shall be allowed ... to any person having an interest in the subject matter and whose ability to protect such interest may be otherwise impaired or impeded.”<sup>1</sup> RNP has an interest in the Sagebrush Power Partners, LLC Kittitas Valley Wind Power Project (“Wind Power Project”) as it is a Northwest based organization with an interest in the responsible development of local clean new renewable resources.<sup>2</sup> The Wind Power Project is the first wind energy project to be reviewed by EFSEC. How it is processed will likely influence how and whether future wind projects will be sited in Washington. The responsible and efficient siting of the Wind Power Project is of particular importance to RNP, and the ability to protect that interest (and other specific interests noted below) will be impaired unless intervention is granted.

#### 1. **Identification of Petitioner**

RNP is a coalition of consumer groups, environmental organizations and renewable energy companies that work together to promote the development of solar, wind and geothermal resources in Oregon, Washington, Idaho, and Montana. RNP currently has 24 members—over half the members are environmental and consumer groups.<sup>3</sup>

Established in 1994, RNP is an advocate for clean air and global climate change solutions through the development of new renewable resources in the region. RNP has three strategic objectives: getting responsible renewable energy projects in the ground, developing and promoting renewable energy policies, and supporting retail green power programs. RNP is

---

<sup>1</sup> WAC 464-30-400.

<sup>2</sup> Declaration of Sonja Ling in Support of Petition to Intervene (“Ling Declaration”), ¶ 2.

<sup>3</sup> Ling Declaration, ¶ 2.

1 a 501©(3) based in Portland, Oregon.<sup>4</sup> RNP has worked with renewable energy developers,  
2 local environmental organizations and agencies on the siting of both large and small renewable  
3 projects throughout the Northwest.<sup>5</sup>

4 **2. Statement of RNP's Interest in the Proceeding and Specific Issues of**  
5 **Concern**

6 RNP's goal is to promote solar, wind, and geothermal development in the region in  
7 order to reduce the impacts of air pollution and global climate change on society and the  
8 environment. RNP directly participates in siting proceedings for new renewable resources to  
9 ensure that proposed wind projects are properly sited.<sup>6</sup> RNP has identified the following  
10 specific issues of concern:

- 11 1. The economic and environmental benefits of wind energy projects.
- 12 2. The importance of resource diversity and rate stability.
- 13 3. The adverse impacts of solely relying on fossil fuels for electricity generation to  
14 meet load growth.
- 15 4. Environmental protection, including the protection of wildlife and habitats.
- 16 5. The regulatory framework needed to ensure appropriate investments in new  
17 renewable resources in Washington.

18 Because of the broad nature of RNPs' goals and issues of concern, RNP requests that it  
19 not be limited to any particular issue, but be allowed to participate with respect to all issues  
20 before EFSEC.

21  
22  
23  
24  
25 

---

<sup>4</sup> Ling Declaration, ¶¶ 1 and 3 .

26 <sup>5</sup> Ling Declaration, ¶ 3.

<sup>6</sup> Ling Declaration, ¶¶ 2 and 3.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

### III. CONCLUSION

RNP requests that the Council grant its motion to intervene in this proceeding. RNP has a particular interest in the effective siting of the Wind Power Project. The manner in which it is sited is important not just for this particular project, but for the future siting of wind projects in Washington. RNP's ability to protect its interest in the responsible and efficient siting of the Wind Power Project will be impaired unless intervention is granted. RNP respectfully requests that intervention be granted with respect to all issues before EFSEC.

DATED this 13th day of June, 2003.

FOSTER PEPPER & SHEFELMAN PLLC

---

Susan Elizabeth Drummond, WSBA #30689  
Attorneys for RNP

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**VERIFICATION**

Sonja Ling declares as follows:

I am the Policy Associate for Renewable Northwest Project, the party seeking intervention in this petition for intervention. I have personal knowledge of the facts in this declaration and am competent to testify to those facts.

I have read the foregoing petition for intervention. I verify that the factual allegations in the petition for intervention are true, and request that the petition for intervention be granted.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED at Portland, Oregon, this 11th day of June 2003.

\_\_\_\_\_  
Sonja Ling

SUBSCRIBED AND SWORN to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2003.

\_\_\_\_\_  
(Signature of Notary)

\_\_\_\_\_  
(Legibly Print or Stamp Name of Notary)

Notary public in and for the State of  
Washington, residing at \_\_\_\_\_

My appointment expires \_\_\_\_\_

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

PETITION TO INTERVENE - 6

**FOSTER PEPPER & SHEFELMAN PLLC**  
1111 THIRD AVENUE, SUITE 3400  
SEATTLE, WASHINGTON 98101-3299 ☎ 206-447-4400